

## REMARKS

Claims 1-15 and 17-32 are pending.

### Response to Examiner's Comments

In the instant Office Action, the Examiner acknowledges that Brown et al. ("Brown;" U.S. Patent No. 5,875,446) fails to disclose an object identifier that is unique to a storage device and unique to all storage devices. Yuen et al. ("Yuen;" U.S. Patent No. 5,488,409) is cited as teaching these limitations.

With regard to Yuen, the Examiner is asked to consider an example in which two video cassette recorders (VCRs) are operated at the same time. According to Yuen, each VCR receives a TP data packet. As described by Yuen, the TP data packet is provided in the vertical blanking interval (VBI) that is part of a broadcast signal. As a broadcast signal, the TP data packet would be received by each of the VCRs. Thus, each VCR receives the same TP data packet. The TP data packet received by each VCR includes a TID (tape identifier) and a program number. Thus, each VCR receives the same TID and program number. As such, there is nothing unique about the TID or the program number. Two tapes can have the same TID. Additional information is provided below in the response to the 103(a) rejections.

Also, according to Yuen, the VCRs can be made to act on the tape recorded by each VCR; specifically, a user can insert a marker at a user-selected point in the recorded tape. Whether by coincidence or on purpose, a user can mark the same point in each tape recorded by the two VCRs. As

such, there is nothing unique about such a marker, even in combination with the TID and/or program number.

In summary, the Applicants respectfully submit that Yuen, alone or in combination with Brown, does not show or suggest an object identifier that is unique to a storage device and unique to all storage devices. A more detailed discussion of the claims and the rejections of the claims follows.

### 103(a) Rejections

#### Claim 1-2 and 4-9

Claims 1-2 and 4-9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Yuen. The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 1-2 and 4-9 is not anticipated nor rendered obvious by Brown and Yuen, alone or in combination.

Independent Claim 1 recites that an embodiment of the present invention is directed to a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique to said mass storage device and also unique to all mass storage devices." Page 4 of the instant Office Action acknowledges that Brown does not disclose this claim limitation.

Applicant respectfully submits that Yuen does not overcome the shortcomings of Brown. Specifically, Applicant understands Yuen to describe

an addressing system that uses a "VISS PLUS TP data packet address system." VISS (video index search system) is a conventional mechanism for inserting a marker at a user-selected point in a recorded video tape, but provides no mechanism for uniquely identifying an object. A TP data packet, as described by Yuen, comprises a TID (tape identifier) and a program number (column 16, lines 19-22, of Yuen). Significantly, according to Yuen, the TP data packet is provided in the VBI (vertical blanking interval) that is part of a broadcast video signal (column 7, lines 25-26, of Yuen). Thus, Applicant respectfully asserts that there is nothing unique about a TP data packet. Each unit receiving the broadcast signal will receive the same TP data packet. Hence, each unit receiving the broadcast signal will assign the same identifier to all video tapes that record that broadcast signal. Indeed, Applicant understands that to be a key aspect of Yuen because an object of Yuen is to monitor the selection habits of viewers of video tapes; as such, a naming convention uniform across video tapes would be preferred by Yuen. As such, Applicant respectfully submits that Yuen (alone or in combination with Brown) does not show or suggest an object identifier that is unique across storage units.

Therefore, Applicant respectfully submits that Yuen, alone or in combination with Brown, does not show or suggest a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier and "wherein said unique object identifier is unique to said mass storage device and also unique to all mass storage devices" as recited in independent Claim 1. Accordingly, Applicant respectfully submits

that the basis for rejecting Claim 1 under 35 U.S.C. § 103(a) is traversed and that Claim 1 is in condition for allowance. As such, Applicant respectfully submits that the basis for rejecting Claims 2 and 4-9 under 35 U.S.C. § 103(a) is also traversed as these claims are dependent on an allowable base claim and recite additional limitations.

#### Claims 10-13

Claims 10-13 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Yuen and further in view of Taira (U.S. Patent No. 6,415,098). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 10-13 is not anticipated nor rendered obvious by Brown, Yuen and Taira, alone or in combination.

Claims 10-13 are dependent on independent Claim 1. Accordingly, by showing that Claim 1 is not shown or suggested by Brown, Yuen and Taira (alone or in combination), it can be demonstrated that Claims 10-13 are also not shown or suggested by Brown, Yuen and Taira (alone or in combination).

As presented above, Applicant respectfully submits that Brown and Yuen do not show or suggest the present invention as recited by Claim 1. Applicant further submits that Taira does not overcome the shortcomings of Brown and Yuen. Applicant understands Taira to describe the storing of title screen data, for example, in a file that is assigned a certain name. Other such files are also used to store other types of data and are assigned names based on the type of data being stored. That is, Applicant understands Taira

to only describe naming files based on the content of the files. Because such files and the naming scheme described by Taira are used from one system to the next, Applicant respectfully submits that the file names described by Taira are not unique as recited in independent Claim 1, and in particular are not unique across all mass storage devices as recited in independent Claim 1.

Thus, Applicant respectfully submits that Taira, alone or in combination with Brown and Yuen, does not show or suggest the limitations of Claim 1 cited above. Specifically, Applicant respectfully submits that Taira, alone or in combination with Brown and Yuen, does not show or suggest a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier and "wherein said unique object identifier is unique to said mass storage device and also unique to all mass storage devices" as recited in independent Claim 1.

In summary, Applicant respectfully submits that Brown, Yuen and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 1 and that Claim 1 is in condition for allowance. As such, Applicant respectfully submits that Brown, Yuen and Taira, alone or in combination, also do not show or suggest the present claimed invention as recited by Claims 10-13, as Claims 10-13 are dependent on an allowable base claim and recite additional limitations. Therefore, Applicant respectfully submits that the basis for rejecting Claims 10-13 under 35 U.S.C. § 103(a) is traversed.

Claims 15, 17-27 and 29-32

Claims 15, 17-27 and 29-32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Yuen and further in view of Taira. The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 15, 17-27 and 29-32 is not anticipated nor rendered obvious by Brown, Yuen and Taira, alone or in combination.

Independent Claim 15 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units." Independent Claim 27 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units."

Page 4 of the instant Office Action acknowledges that Brown does not disclose the limitations of independent Claims 15 and 27 cited above. As presented above, Applicant respectfully submits that Yuen does not overcome the shortcomings of Brown. Specifically, Applicant respectfully submits that Yuen, alone or in combination with Brown, does not show or suggest "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units" as recited in Claim 15, nor does Yuen, alone or in

combination with Brown, show or suggest "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units" as recited in Claim 27.

Furthermore, Applicant respectfully submits that Taira does not overcome the shortcomings of Brown and Yuen. As presented above, Applicant respectfully submits that Taira, alone or in combination with Brown and Yuen, does not show or suggest "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units" as recited in Claim 15, nor does Taira, alone or in combination with Brown and Yuen, show or suggest "wherein said unique object identifier is unique to said mass storage unit and across all mass storage units" as recited in Claim 27.

Thus, Applicant respectfully submits that Brown, Yuen and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 15 and 27 and that these claims are in condition for allowance. As such, Applicant respectfully submits that Brown, Yuen and Taira, alone or in combination, also do not show or suggest the present claimed invention as recited by Claims 17-26 dependent on Claim 15 and Claims 29-32 dependent on Claim 27, as Claims 17-26 and 29-32 are dependent on allowable base claims and recite additional limitations. Therefore, Applicant respectfully submits that the basis for rejecting Claims 15, 17-27 and 29-32 under 35 U.S.C. § 103(a) is traversed.

### Claims 3 and 14

Claims 3 and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Yuen and further in view of Hoover et al. ("Hoover;" U.S. Patent No. 5,724,575). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 3 and 14 is not anticipated nor rendered obvious by Brown, Yuen and Hoover, alone or in combination.

Claims 3 and 14 are dependent on independent Claim 1. Accordingly, by showing that Claim 1 is not shown or suggested by Brown, Yuen and Hoover (alone or in combination), it can be demonstrated that Claims 3 and 14 are also not shown or suggested by Brown, Yuen and Hoover (alone or in combination).

As described above, Applicant respectfully submits that Brown and Yuen, alone or in combination, do not show or suggest the present claimed invention as recited by Claim 1. Applicant respectfully submits that Hoover does not overcome the shortcomings of Brown and Yuen. Applicant understands Hoover to describe object identifiers that persist over time. However, Applicant respectfully submits that Hoover, alone or in combination with Brown and Yuen, does not show or suggest "wherein said unique object identifier is unique to said mass storage device and also unique to all mass storage devices" as recited in independent Claim 1. Although Hoover recites "a unique identifier," there is no showing or suggestion in Hoover that the object identifier of Hoover is truly unique as recited by Claim 1.



Furthermore, regarding Claim 3, Applicant respectfully submits that Hoover, alone or in combination with Brown, does not show or suggest "including in said unique object identifier a date and time corresponding to when said unique object identifier is derived" as recited in Claim 3 (emphasis added). Figure 7 of Hoover very clearly shows the object identifier of Hoover as being an entity that is separate and distinct from the status information (e.g., the date), whereas the present claimed invention recites that the date and time are included in the object identifier. Applicant respectfully submits that updating a table that contains an object identifier and a date as separate entities cannot be read as including a date and time in an object identifier, as recited by Claim 3, and therefore Applicant respectfully disagrees with the interpretation of Hoover that is presented in the instant Office Action.

In summary, Applicant respectfully submits that Brown, Yuen and Hoover, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 1, and that Claim 1 is in condition for allowance. As such, Applicant respectfully submits that Brown, Yuen and Hoover, alone or in combination, also do not show or suggest the present claimed invention as recited by Claims 3 and 14 dependent on Claim 1, as Claims 3 and 14 are dependent on an allowable base claim and recite additional limitations. Therefore, Applicant respectfully submits that the basis for rejecting Claims 3 and 14 under 35 U.S.C. § 103(a) is traversed.

### Claim 28

Claim 28 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Yuen and Taira and further in view of Hoover. The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claim 28 is not anticipated nor rendered obvious by Brown, Yuen, Taira and Hoover, alone or in combination.

Claim 28 is dependent on independent Claim 27. Accordingly, by showing that Claim 27 is not shown or suggested by Brown, Yuen, Taira and Hoover (alone or in combination), it can be demonstrated that Claim 28 is also not shown or suggested by Brown, Yuen, Taira and Hoover (alone or in combination).

As presented above, Applicant respectfully submits that Brown, Yuen and Taira, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 27. Applicant respectfully submits that Hoover does not overcome the shortcomings of Brown, Yuen and Taira. Hoover, alone or in combination with Brown, Yuen and Taira, also does not show or suggest a unique object identifier that is unique across all mass storage units. Accordingly, Applicant respectfully submits that Brown, Yuen, Taira and Hoover, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claim 27 and that Claim 27 is in condition for allowance. Therefore, Applicant respectfully submits that Brown, Yuen, Taira and Hoover (alone or in combination) also do not show or suggest the additional claimed features of the present invention as recited in Claim 28 and that Claim 28 is in condition for allowance as being

dependent on an allowable base claim. Therefore, Applicant respectfully submits that the basis for rejecting Claim 28 under 35 U.S.C. § 103(a) is traversed.

### Conclusions

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-15 and 17-32 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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